

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

November 9, 2022
Ravi Subramanian, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

RICHARD SHELDON CURRY,
Defendant.

NO. **CR22-196 RSM**
INDICTMENT

The Grand Jury charges that:

COUNT 1

(Knowingly Making False Statements in Attempt to Acquire Firearm)

On or about July 11, 2022, in King County, within the Western District of Washington, RICHARD SHELDON CURRY, in connection with the attempted acquisition of a firearm, that is, a Hi Point, Model JHP .45ACP pistol, from a licensed dealer, did knowingly make false and fictitious written statements and furnish false, fictitious, and misrepresented identification, which was intended and likely to deceive such dealer with respect to a fact material to the lawfulness of the sale of such firearm, that is, by providing a forged document falsely representing himself to be a Federal Firearms Licensee.

All in violation of Title 18, United States Code, Section 922(a)(6).

COUNT 2**(Unlawful Possession of a Firearm)**

On or about November 3, 2022, in King County, within the Western District of Washington, RICHARD SHELDON CURRY, knowing he had been convicted of the following crimes punishable by a term of imprisonment exceeding one year:

- i. *Domestic Violence Felony Violation of a Court Order*, in King County Superior Court under cause number 12-1-02140-2 SEA, on or about November 16, 2012;
- ii. *Robbery in the First Degree*, in King County Superior Court under cause number 91-C-05131-0 SEA, on or about April 17, 1992;

did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, a Ruger model P97DC .45 ACP caliber semi-automatic pistol, which had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The allegations contained in Counts 1 - 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of any of the offenses alleged in Counts 1 and 2, RICHARD SHELDON CURRY shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms and ammunition that were involved in the offenses, including but not limited to:

- a. a Ruger model P97DC .45 ACP caliber semi-automatic pistol and all associated ammunition, seized from the person of RICHARD SHELDON CURRY on or about November 3, 2022.

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
2 any act or omission of the defendants,

- 3 a. cannot be located upon the exercise of due diligence;
4 b. has been transferred or sold to, or deposited with a third party;
5 c. has been placed beyond the jurisdiction of the Court;
6 d. has been substantially diminished in value; or,
7 e. has been commingled with other property which cannot be divided
8 without difficulty;

9 it is the intent of the United States to seek the forfeiture of any other property of the
10 defendant, up to the value of the above-described forfeitable property, pursuant to
11 Title 21, United States Code, Section 853(p).

12
13 A TRUE BILL:

14 DATED: 11/9/2022

15 *Signature of Foreperson redacted pursuant*
16 *to the policy of the Judicial Conference of*
17 *the United States.*

18 _____
19 FOREPERSON

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19 _____
20 NICHOLAS W. BROWN
21 United States Attorney

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22 _____
23 TODD GREENBERG
24 Assistant United States Attorney

24 
25 _____
26 CECELIA GREGSON
27 Assistant United States Attorney